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Attorney for **RAKESH VIJ**

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF CALIFORNIA

In re
GAVIN GREGORY MEHL
Debtor,

Bankruptcy Case No. 19-26296

DC No. CPG-001

**NOTICE OF MOTION FOR RELIEF
FROM STAY BY RAKESH VIJ**

Local Rule 9014-1 (f) (2)

Date: October 22, 2019

Time: 1:30 p.m.

Courtroom: 33

Dept.: C

TO THE HONORABLE CHRISTOPHER KLEIN, UNITED STATES BANKRUPTCY COURT
JUDGE, THE DEBTOR, THE DEBTOR’S COUNSEL, IF ANY, THE TRUSTEE AND OTHER
INTERESTED PARTIES:

PLEASE TAKE NOTICE that on **October 22, 2019 at 1:30 p.m. a.m. in Department C,**
Courtroom 33, at the United States Bankruptcy Court located at 501 I Street, Sacramento,
California, 6th Floor, a hearing will held on the Motion of RAKESH VIJ (hereinafter VIJ) for
relief from the automatic stay.

1 The Motion is based upon this Notice of Motion, the Motion for Relief From Stay, supporting
2 points and authorities contained therein, supporting declarations, Movants' Relief from Stay
3 Information Sheet, and upon the documents filed in support of the Motion and matters as to
4 which the court may take judicial notice.

5 This Motion is being filed pursuant to Local Bankruptcy Rule 9014-1(f)(2) - which provides that
6 "the moving party may file and serve the motion at least fourteen (14) calendar days prior to the
7 hearing date. The use of this alternative procedure in connection with a motion for relief from the
8 automatic stay shall be deemed a waiver of the time limitations contained in 11 U.S.C. §362(e).
9 Furthermore, when fewer than twenty-eight (28) calendar days' notice of a hearing is given, no
10 party in interest shall be required to file a written opposition to the motion. Opposition, if any,
11 shall be presented at the hearing on the motion. If opposition is presented, or if there is other
12 good cause, the Court may continue the hearing to permit the filing of evidence and briefs."
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15 The Motion seeks relief from the automatic stay to take any and all steps
16 necessary or permitted in accordance with applicable state law to obtain control and possession
17 of the property commonly known as known 890 WEDGEWOOD COURT, WEST
18 SACRAMENTO, CA 95605, YOLO COUNTY; APN 014-730-013 (hereinafter Subject
19 Property) including but not limited to prosecution of an unlawful detainer action entitled Rakesh
20 Vij v Gavin Mehl, et al, Yolo County Superior Court action UD19-879 as allowed by state law.
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22 Movant requests in the Motion an order waiving the fourteen day stay described in
23 Bankruptcy Rule 4001(a)(3).
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The Motion is based upon cause, lack of equity and the fact that the Subject Property is not necessary for reorganization.

Respectfully submitted,

Dated: October 8, 2019

GREISEN LAW CORPORATION



CARY P. GREISEN, Attorneys for RAKESH VIJ